

UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

ROBERT STOUD,	:	
	:	
Plaintiff	:	CIVIL ACTION - LAW
	:	
v.	:	
	:	
SUSQUEHANNA COUNTY,	:	NO. 3:17-CV-2183-MEM
	:	
Defendant	:	

MOTION TO EXTEND DEADLINE FOR EXPERT REPORTS

Defendant, Susquehanna County, through its attorneys, Kreder Brooks Hailstone LLP, hereby requests the Court to extend the deadline for expert reports and cite the following reasons, therefore:

1. By Order dated June 17, 2019 [Doc. 48], the Court set deadlines for the expert reports from the Defendant for August 16, 2019.
2. Defendant seeks on extension to provide expert reports to November 11, 2019.

3. Plaintiff concurs in this request.
4. The requested extension will not unreasonably delay trial.

WHEREFORE, it is respectfully requested that the Court extend the deadline for expert reports to November 11, 2019.

KREDER BROOKS HAILSTONE LLP

By /s/A. James Hailstone
A. James Hailstone
Attorney for Defendant

CERTIFICATE OF CONCURRENCE

I, A. James Hailstone, hereby certify that I contacted Plaintiffs' counsel in accordance with the Local Rules to determine whether he would concur in the attached Motion. Plaintiffs' counsel concurs with the attached Motion.

KREDER BROOKS HAILSTONE LLP

220 Penn Avenue, Ste 200
Scranton, PA 18503

/s/A. James Hailstone

A. James Hailstone
Attorney I.D. #80055
Attorneys for Defendant

CERTIFICATE OF SERVICE

AND NOW, this 10th day of September, 2019, A. James Hailstone, a member of the firm of Kreder Brooks Hailstone LLP, electronically filed the foregoing Motion with the Clerk of the United States District Court for the Middle District of Pennsylvania using the CM/ECF system which sent notification of such filing to the following Filing Users at the following e-mail address(es):

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